

United States District Court  
Southern District of New York

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Westminster Securities Corporation,  
David R. Holbrooke, M.D, AWM Holdings,  
LLC and John O'Shea,

15 Civ. 04181(VM)

Plaintiffs,

v.

Uranium Energy Corporation and  
UEC Concentric Merge Corporation,

Defendants.  
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Plaintiffs' Initial Rule 26(a)(1) Disclosures

Pursuant to Fed. R. Civ. P. Rule 26(a)(1), Plaintiffs Westminster Securities Corporation, David R. Holbrooke, M.D, AWM Holdings, LLC and John O'Shea provides their Initial Disclosures based upon their current knowledge. Plaintiffs reserves the right to amend and/or supplement these disclosures.

I. (a)(1)(A)(i) the name and the address and telephone number of individuals likely to have discoverable information that Plaintiffs may use to support their claims and the subject of the information they may have. Plaintiffs have provided contact information to the best of their current knowledge.

1. Rockwell Hankin - 2342 Rock Creek Drive, Charlotte, NC 2822 - issuance of 877,000

shares on August 12, 2009 and April 10, 2010, merger of UEC and CEC,

exchange of UEC Warrants for CEC Warrants

Richard Graff - 2339 Woodbury Lane, Evergreen CO, 80439 - issuance of 877,000

shares on August 12, 2009 and April 10, 2010, merger of UEC and CEC,

exchange of UEC Warrants for CEC Warrants

Ronald Parratt - 2190 Augusta Avenue, Reno, NV 89509 - issuance of 877,000 shares

on August 12, 2009 and April 10, 2010, merger of UEC and CEC, exchange of

UEC Warrants for CEC Warrants

Andrew Simpson - issuance of 877,000 shares on August 12, 2009 and April 10, 2010

merger of UEC and CEC, exchange of UEC Warrants for CEC Warrants

Lynn Oates - 4625 Tumbleweed Drive, Cave Creek, AZ 85331 - issuance of 877,000

shares on August 12, 2009 and April 10, 2010, merger of UEC and CEC,

exchange of UEC Warrants for CEC Warrants

Ralph Kettell - 25214 Firewood Lane, Spring TX 77373 - issuance of shares in April

2010, merger between UEC and CEC, exchange of UEC Warrants for CEC

Warrants

Amir Adnani - merger of UEC and CEC, exchange of UEC Warrants for CEC

Warrants

Mark Katsumata - merger of UEC and CEC, exchange of UEC Warrants for CEC

Warrants

Alan Lindsay - merger of UEC and CEC, exchange of UEC Warrants for CEC  
Warrants

Harry Anthony - merger of UEC and CEC, exchange of UEC Warrants for CEC  
Warrants

Erik Essiger - merger of UEC and CEC, exchange of UEC Warrants for CEC  
Warrants

Vincent Della Volpe - merger of UEC and CEC, exchange of UEC Warrants for CEC  
Warrants

David Kong - merger of UEC and CEC, exchange of UEC Warrants for CEC  
Warrants

Kevin Smith - Traxis Group, 825 Third Avenue, New York, NY 10022 - value of  
CEC shares

John O'Shea - 100 Wall Street, New York, NY 10005 - Plaintiffs' purchase of CEC  
stock, debentures and warrants; receipt of UEC warrants

Chris McNeur - 315 Madison Avenue, New York, NY 10017 - Plaintiffs' purchase of  
CEC stock, debentures and warrants; receipt of UEC warrants

David Holbrooke - 120 Buckley Avenue, Sausalito, CA 94965 - Plaintiffs' purchase  
of CEC stock, debentures and warrants; receipt of UEC warrants

Eric Kline, Semple, Marchal & Cooper, 2700 North Central Avenue, Phoenix AZ -  
valuation of CEC stock

Ernst & Young, Vancouver CA - valuation of CEC stock

II. (a)(1)(A)(ii) A copy of, or a description by category and location of all documents, data, compilations, and tangible things that are in the possession, custody, or control of the party that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

1. Transaction documents relating to Plaintiffs' acquisition of CEC Stock and Warrants.
2. Emails and correspondence between Plaintiffs and i) CEC, and its officers, directors, employees, attorneys and agents and ii) UEC, and its officers, directors, employees, attorneys and agents relating to merger, acquisition of UEC Warrants and matters relating to the CEC and UEC Warrants.

All documents are located at the premises of the Plaintiffs.

III. (a)(1)(A)(iii) a computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which the computation is based, including materials bearing on the nature and extent of injuries suffered.

Plaintiffs' damages are calculated based upon the effective price at which CEC issued shares in August 2009 and April 2010. Such price would have reduced the exercise price of the CEC Warrants held by Plaintiffs and increased the number of shares into which those Warrants were exercisable. Under the terms of the CEC Warrants, UEC, as CEC's successor, was bound to honor all the terms of the CEC Warrants, including the ratchet down and cashless exercise

provisions thereof. Based upon an effective price of \$0.001 per share for the CEC share issuances in August 2009 and April 2010, and based upon a merger ratio of 9.3:1 between CEC shares and UEC shares, and the exercise price of the CEC Warrants and the UEC Warrants, UEC, at the time the merger between CEC and UEC closed in September, 2011, should have issued 70,359,774 UEC Warrants to Plaintiffs exercisable at \$0.011 per share. Upon termination of the Warrants on December 31, 2012, UEC should have issued 70,049,628 freely trading shares of stock to Plaintiffs.

IV. (a)(1)(A)(iv) Applicable Insurance Agreements

Not applicable.

Dated: New York, New York  
November 30, 2015

Law Offices of Kenneth A. Zitter

By 

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